

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 12 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
TED ROTH, M.D. FOR WAVE 12**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Ted Roth for Ethicon Wave 4, Dkt. 3658 (motion), Dkt. 3668 (memorandum in support) and Dkt. 3857 (reply brief). Plaintiffs respectfully request that the Court exclude Ted Roth's testimony, for the reasons expressed in the Wave 4 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 29, 2019

Respectfully submitted,

/s/ D. Renee Baggett

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EXHIBIT A

Garcia, Nina	2:13-cv-01942
Gutierrez, Wanda	2:13-cv-15716
Hervey, Susan, Personal Representative of Estate of Georgia Hervey, deceased	2:12-cv-05839
Raney, Kimberly	2:13-cv-10010
Rondot, Charlotte	2:13-cv-15143
Schultz, Nettie	2:13-cv-21986

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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